

EXHIBIT 1

1 MORGAN, LEWIS & BOCKIUS LLP
KENT M. ROGER, State Bar No. 95987
2 DIANE L. WEBB, State Bar No. 197851
MICHELLE PARK CHIU, State Bar No. 248421
3 JASON B. ALLEN, State Bar No. 251759
One Market, Spear Street Tower
4 San Francisco, CA 94105-1126
Tel: 415.442.1000
5 Fax: 415.442.1001
E-mail: kroger@morganlewis.com
6 dwebb@morganlewis.com
mchiu@morganlewis.com
7 jason.allen@morganlewis.com

8 Attorneys for Defendants
HITACHI, LTD.
9 HITACHI DISPLAYS, LTD.
HITACHI ASIA, LTD.
10 HITACHI AMERICA, LTD.
HITACHI ELECTRONIC DEVICES (USA), INC.
11

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION
15

16 IN RE CATHODE RAY TUBE (CRT)
17 ANTITRUST LITIGATION

Case No. C07-5944 SC

MDL NO. 1917

Judge: Hon. Samuel Conti

Special Master: Hon. Charles A. Legge (Ret.)

20 This Document Relates To:
21 ALL ACTIONS
22

**DECLARATION OF KATSUYUKI
KAWAMURA IN SUPPORT OF THE
HITACHI DEFENDANTS'
EVIDENTIARY PROFFER**

23 **DECLARATION OF KATSUYUKI KAWAMURA**

24 I, Katsuyuki Kawamura, declare:

25 1. I am Katsuyuki Kawamura of Hitachi Displays, Ltd. ("HDP"). I make this
26 declaration in support of the Hitachi Defendants' proffer. I have personal knowledge of the facts
27 contained in this declaration, except for those, if any, based on information and belief, and, if
28 called as a witness, would and could competently testify to them.

DB2/22062126.4

MDL 1917

DECLARATION OF KATSUYUKI KAWAMURA IN SUPPORT OF
THE HITACHI DEFENDANTS' EVIDENTIARY PROFFER

2. I am Deputy Senior Manager of the CFL Department of HDP. I have been employed by HDP since approximately October 2002. Prior to my current position, I also was employed by Hitachi, Ltd. ("HTL") in the CRT design department. I was employed by HTL beginning on approximately April 1974 to September 2002. As a result of my position within HDP and HTL, I am familiar with HDP's historical business relating to color picture tubes ("CPT tubes").

3. In October 2002, the Display Group of Hitachi, Ltd. ("HTL") was spun off to HDP. HDP never engaged directly in the manufacturing or sale of CDT tubes or CPT tubes. As a result of the October 2002 spin-off, however, HDP retains documents relating to HTL's Display Group's manufacturing and sale of CDT tubes and CPT tubes.

4. HTL's Display Group sold and manufactured color display tubes ("CDT tubes") and color picture tubes ("CPT tubes").

I. CDT Tubes

5. HTL's Display Group began selling and manufacturing CDT tubes as early as 1979 at its factories located in Japan.

6. On July 26, 2001, HTL announced it would withdraw from manufacturing and selling "CRTs for PC monitors," and "by the end of 2001 Hitachi [would] halt production of monitor CRTs at its manufacturing bases in Japan, Singapore and Malaysia." See the Hitachi Defendants' Request for Judicial Notice, ¶ 1; Exhibit 1 (attaching HTL's August 29, 2001 Form 6-K, which contains a copy of HTL's July 26, 2001 press release referenced above).

7. I am informed and believe, based upon my review of HDP's business records related to HTL's Display Group, that HTL ceased manufacturing CDT tubes in December 2001.

8. I am informed and believe, based upon my review of HDP's business records related to HTL's Display Group, that HTL's final CDT tube sale to the United States took place in 1998.

9. I am informed and believe, based on my knowledge and review of HDP's business records related to HTL's Display Group, that HTL's final CDT tube sale worldwide took place in 2002. HTL sold a very small number of CDTs related to repairs through February 2004.

1 10. I am informed and believe that HTL's CDT tube customers were located in Japan,
2 Europe, Asia, Canada, Mexico, and the United States.

3 **II. CPT Tubes**

4 11. I am informed and believe, based upon my review of HDP's business records
5 related to HTL's Display Group, that HTL began selling and manufacturing CPT tubes as early as
6 1958 at its factories located in Japan.

7 12. I am informed and believe, based upon my review HDP's business records related
8 to HTL's Display Group, that HTL ceased manufacturing of CPTs in October 1998.

9 13. I am informed and believe, based upon my review of HDP's business records
10 related to HTL's Display Group, that HTL's final CPT tube sale to the United States took place
11 prior to 1995.

12 14. I am informed and believe, based upon my review of HDP's business records
13 related to HTL's Display Group, that HTL's final CPT tube sale worldwide took place in
14 September 2002.

15 15. I am informed and believe that HTL's CPT tube customers were located in Japan,
16 Europe, Asia, Canada, Africa, Australia, South America, Mexico, and the United States.

17 **III. CRT Finished Products**

18 16. HDP has never engaged in the manufacturing or sale of CDT computer monitors.

19 17. HDP has never engaged in the manufacturing or sale of CPT televisions.

20 I declare under the penalty of perjury under the laws of the United States of America and
21 the State of California that the foregoing is true and correct.

22 Executed this 6th day of December, 2010, in Tokyo, Japan.

23
24 

25 Katsuyuki Kawamura
26
27